

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AKANIXENE WILLIAM ETUK

Write the full name of each plaintiff.

\_\_\_\_ CV \_\_\_\_

(Include case number if one has been assigned)

-against-

NEW YORK CITY POLICE DEPT, et al.,

**COMPLAINT**

Do you want a jury trial?

☐ Yes ☒ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

RECEIVED  
SDNY PRO SE OFFICE  
2024 JUN 26 PM 2:08

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☒ Federal Question  
☐ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

VIOLATION OF RIGHT TO TRAVEL, VIOLATION OF RIGHT TO PRIVACY,  
EXCESSIVE FORCE, FALSE IMPRISONMENT, VIOLATION OF  
AMERICAN WITH DISABILITY ACT, DUE PROCESS VIOLATION.

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, \_\_\_\_\_, is a citizen of the State of \_\_\_\_\_  
(Plaintiff's name)

\_\_\_\_\_  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

\_\_\_\_\_  
If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of \_\_\_\_\_  
(Defendant's name)

\_\_\_\_\_  
or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

AKANBIYENE W ETUK  
First Name Middle Initial Last Name

2404 ATLANTIC AVENUE # 04  
Street Address

BROOKLYN NY 11233  
County, City State Zip Code

(818) 485-9411 (929) 676-0970 awetuk001@gmail.com  
Telephone Number Email Address (if available)

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

NEW YORK CITY POLICE DEPARTMENT  
 First Name Last Name

Current Job Title (or other identifying information)

1 POLICE PLAZA

Current Work Address (or other address where defendant may be served)

NEW YORK NY 10038  
 County, City State Zip Code

Defendant 2:

JOHN DOE OFFICERS  
 First Name Last Name

Current Job Title (or other identifying information)

215 E 161 STREET

Current Work Address (or other address where defendant may be served)

BRONX NY 10451  
 County, City State Zip Code

Defendant 3:

First Name Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: TRAIN STATION BRONX

Date(s) of occurrence: 03/09/2023

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

PLEASE SEE ATTACHED MARKED (f)

United State District Court

4

United States District Court

Southern District of New York

500 Pearl Street

New York, NY 10007

Akaniyene William Etuk

2402 Atlantic Avenue #04

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 /1(929) 676-0970

**Pro Se Plaintiff**

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF NEW YORK**

**Akaniyene William Etuk,**

Plaintiff,

v.

**New York City Police Department, et al.,**

Defendants.

**Case No.:** \_\_\_\_\_

**COMPLAINT**

United State District Court

## **Introduction**

This is a civil rights action brought by Plaintiff, Akaniyene William Etuk, against officers of the New York City Police Department ("NYPD") for violations of Plaintiff's constitutional rights, including the right to travel, the right to privacy, protection against unreasonable searches and seizures, as well as violations of the Americans with Disabilities Act ("ADA").

## **Jurisdiction and Venue**

1. This Court has jurisdiction over this action under 28 U.S.C. § 1331 (federal question jurisdiction) and 42 U.S.C. § 1983 (civil action for deprivation of rights).
2. Venue is proper in the Southern District of New York under 28 U.S.C. § 1391(b) because the events giving rise to this claim occurred in this district.

## **Parties**

3. Plaintiff, Akaniyene William Etuk , is a resident of Brooklyn , New York and was a resident of Bronx, New York at time of incident.
4. Defendant, New York City Police Department, is a municipal agency located at 1 Police Plaza, New York, NY 10038.
5. Defendants John Doe Officers 1-10 are officers of the NYPD stationed at 215 E 161 St., Bronx, NY 10451, whose identities are currently unknown.

## **Facts**

6. On March 9, 2023, Plaintiff was traveling on a train in the Bronx, New York.

United State District Court

7. Plaintiff, accompanied by a registered service animal providing essential services, was stopped by NYPD officers from the station located at 215 E 161 St., Bronx, NY 10451, without Plaintiff's permission or any contractual basis.
8. NYPD officers forced Plaintiff to identify himself, thereby violating Plaintiff's right to privacy.
9. NYPD officers made several legal determinations without possessing a license to practice law.
10. NYPD officers did not show their identification cards, thus failing to verify themselves as registered policemen.
11. NYPD officers approached Plaintiff with guns, forcing Plaintiff under threat, duress, and coercion to engage with them.
12. NYPD officers issued a summons (Case #Docket number 2023SX005516, Summon number 4446495504) on March 9, 2023, without lawful authority. A copy of the dismissal certificate is attached as Exhibit A.
13. NYPD officers used physical force, causing Plaintiff and his service animal pain, without any lawful contact or justification.
14. NYPD officers transported Plaintiff and his service animal to a location different from his intended point of travel and injected Plaintiff with a substance without consent or contractual agreement.
15. There is no evidence that these NYPD officers did not threaten Plaintiff and hold him at gunpoint to traffic Plaintiff and his service animal without permission or a contract.
16. There is no evidence that these NYPD officers were not working for a foreign corporation or that they were in fact legitimate police officers for the original Republic.

United State District Court

17. There is no evidence that these officers signed an oath to "We the People," indicating they were working for a criminal syndicate.

18. Plaintiff's service animal was registered and vaccinated at the time of the incident. Copies of the service animal registration and vaccination papers are attached as Exhibits B and C, respectively.

**Claims for Relief**

**Count I: Violation of the Right to Travel**

19. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-18 as though fully set forth herein.

20. Defendants' actions on March 9, 2023, violated Plaintiff's right to travel freely within the United States.

**Count II: Violation of the Right to Privacy**

21. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-18 as though fully set forth herein.

22. Defendants' actions in forcing Plaintiff to identify himself without justification violated Plaintiff's right to privacy.

**Count III: Excessive Force**

23. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-18 as though fully set forth herein.

United State District Court

24. Defendants' use of physical force against Plaintiff and his service animal without lawful justification constituted excessive force in violation of the Fourth Amendment.

**Count IV: False Imprisonment**

25. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-18 as though fully set forth herein.

26. Defendants' actions in detaining and transporting Plaintiff and his service animal without lawful justification constituted false imprisonment.

**Count V: Violation of the Americans with Disabilities Act (ADA)**

27. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-18 as though fully set forth herein.

28. Defendants' arrest and detention of Plaintiff and his registered service animal, who was providing essential services at the time, constituted discrimination under the ADA.

**Count VI: Due Process Violations**

29. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-18 as though fully set forth herein.

30. Defendants' actions deprived Plaintiff of liberty and property without due process of law, in violation of the Fourteenth Amendment.

**Prayer for Relief**

United State District Court

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against Defendants, and award Plaintiff:

- A. One million dollars (\$1,000,000) for each violation of Plaintiff's constitutional rights and the ADA;
- B. One million dollars (\$1,000,000) for the violation of Plaintiff's registered service animal's rights under the ADA;
- C. Punitive damages in an amount to be determined at trial;
- D. Declaratory relief stating that Defendants' actions violated Plaintiff's constitutional rights and the ADA;
- E. Injunctive relief preventing Defendants from engaging in similar conduct in the future;
- F. Reasonable attorney's fees and costs of this action;
- G. Such other and further relief as the Court deems just and proper.

**Judge Demand**

Plaintiff demands a trial by judge on all issues so triable.

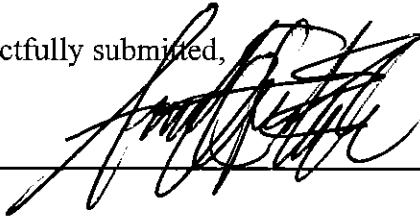
**Exhibits**

- Exhibit A: Copy of Dismissal Certificate
- Exhibit B: Copy of Service Animal Registration
- Exhibit C: Copy of Service Animal Vaccination Papers

United State District Court

Dated: 06/24/2024

Respectfully submitted,



---

Akaniyene William Etuk

Plaintiff, Pro Se

2402 Atlantic Avenue #o4

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 /1(929) 676-0970



10/22/22, 12:22 PM

Vet Treatment History



Animal  
Care Centers  
of NYC

2336 Linden Boulevard  
Brooklyn NY 11208  
212-788-4000

### Vet Treatment History

#### Owner Details

Akaniyene Etuk  
1923 McDonald Avenue APT 167  
BROOKLYN NY 11223

818 485 9411  
818 485 9411

#### Animal Details

Name: Veilee  
Type: Dog  
Mixed: Yes  
Color(1): Unknown (update later)  
Gender: Female  
Spayed / Neutered: Unknown  
Age: 10 Months

This is to confirm that our records show that the animal described above has had the following vaccinations and treatments administered:

Vet Treatment Type	Date Given	Type	Expiration Date	Route Of Admin	Result	Vet	License #
1 Rabies Vaccine	22-Oct-2022	Killed				VET-P 991234	NY-010887

Vet Treatment Type	Due Date
1 Rabies Vaccine	22-Oct-2023

Vet Signature:

Dr. Michelle Lugo

Date: 10/22/2022 1:19:00 PM



Animal  
Care Centers  
of NYC

## Reunification Form

326 East 110th Street  
New York NY 10029  
212-788-4000

### Agent / Owner's Details

Person ID: 138876  
Receipt #: 249314  
Receipt Date: 7/12/2023

Person Name: Akaninyene Eink  
Person Address: 1923 Mc donald Avenue APT 167  
BROOKLYN NY 11223  
Home Phone:  
Mobile Phone: 818 489 9411  
Email: awetuk01@gmail.com

### Animal Details:

Animal ID	Name	Type	Mixed	Color(1)	Color(2)
1 176452	Veillee	Dog	Yes	Black Brown	
Gender	Spayed / Neutered	Age	Incoming Date	License fee	
Female	No	3 Years	6-Jul-2023		

### Reunification Details:

Item	Amount
------	--------

### Products / Services:

Product / Service	Date	Quantity	Price Each
Microchip Implantation		1	\$0.00
Microchip Implantation		1	\$0.00
Bordetella Vaccine		1	\$15.00
DA2PP Vaccine		1	\$15.00
Dewormer Treatment		1	\$12.00
Medical Exam		1	\$30.00
NYC Dog Licence, unaltered [LICU]		1	\$34.00
Rabies Vaccine		1	\$15.00
Restoration/Redemption Fee		1	\$3.00
Total products / services fee included in payment details below:			\$124.00

### Payment Details:

Fee	Amount
Reunification	\$0.00
Dog License	\$0.00
Amount Paid	\$0.00

### Notes:

Entered By: 456 991311 Printed By: 456 991311 Printed On: Jul 12 2023 10:10AM

### Reunification Agreement:

REUNIFICATION CONTRACT



Animal  
Care Centers  
of NYC

## Agency Receipt

326 East 110th Street  
New York NY 10029  
212-788-4000

### Person Details

Person ID: 5951  
Receipt #: 285399  
Receipt Date: 5/25/2024

Person Name: Police 52nd Precinct Police 52nd Precinct  
 Person Address: 3016 Webster Avenue  
 Bronx NY 10467  
 Home Phone:  
 Mobile Phone: 718 220 5811  
 Email:  
 Identification Type:  
 ID Number:

### Animal Details

Animal ID	Name	Type	Mixed	Color(1)	Color(2)
1 153814	Veillee	Dog	Yes	Black	Tan
Gender	Spayed / Neutered	Age	Primary Microchip #	Rabies Tag	Date In / Found
Female	No	3 Years 8 Months 3 Weeks (approx)	985113005559199	23-278818	25-May-2024

### Payment Details:

Fee	Amount
Amount Paid	\$0.00

### Notes:

Jurisdiction: Bronx

Entered By: 1582 992296 Printed By: 1582-992296 Printed On: May 25 2024 9:47PM Entered By User ID: 1582

### Conditions:

ACC's Surrender Prevention program can help you keep your pet! This program can provide you with information about free or low-cost veterinary care, pet food, behavior training, and more. Would you like to speak with an Admissions Counselor for more information? ☐ YES ☐ NO

### PLEASE CONSIDER CAREFULLY

ANIMALS SURRENDERED TO ACC ARE CAREFULLY EVALUATED BASED ON AVAILABLE MEDICAL AND BEHAVIOR INFORMATION FOR ADOPTION, TRANSFER TO A RESCUE PARTNER, OR EUTHANASIA (HUMANELY PUT TO DEATH) AT THE SOLE DISCRETION OF ACC.

In consideration of Animal Care Centers of New York City ("ACC") accepting the animal described herein ("this animal"), I understand and agree as follows (please initial each section):

ACC does not guarantee that this animal will be adopted by a member of the public or transferred to a rescue partner. I understand that the length of time the animal may be held and the outcome, including adoption or humane euthanasia, is solely ACC's decision.

ACC may require that questions or other requests regarding the outcome of this animal be made in writing.

If this animal has bitten a person or animal, I will inform ACC.

USA SERVICE DOG REGISTRATION

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CALL OR TEXT NOW 780-263-1793

REGISTRATION LOOKUP

LOGIN


MY ACCOUNT Print

HANDLER INFO



**Akaninyano Eluk**  
 1923 McDonald Avenue #167, Brooklyn,  
 NY 11223  
 Email:  
 polyphonicsystems@gmail.com  
 Phone: 2135632646


REGISTERED ANIMALS




**Animal #1: Vellos**  
 Breed: Rottweiler  
 Type: Service Dog

**Handler: Akaninyano Eluk**  
 1923 McDonald Avenue #167,  
 Brooklyn, NY 11223  
 polyphonicsystems@gmail.co  
 m | 2135632646

**Registration: 1009078684**  
 Service: Medical Alert  
 Training Status: My Dog is  
 "Trained Service animal"





I have housing letter requl.

How to make my dog Sam.

Forget my registration nu...

Windows taskbar: 5:10 PM 6/23/2024

THE PEOPLE OF THE STATE OF NEW YORK  
VS.

**ETUK, AKANINYENE**

DEFENDANT

**900 E 35TH ST APT D2 D2**

ADDRESS

**BROOKLYN NY 11210-3448**

CITY STATE ZIP

DOCKET NUMBER: **2023SX005516**

CERTIFICATE OF DISPOSITION  
NUMBER: 48917

**NO FEE**

**01/08/1997**

DATE OF BIRTH

**03/09/2023**

ISSUE DATE

SUMMONS NUMBER: **4446495564**

**PL 240.20 02 0V**

ARRAIGNMENT CHARGES

CASE DISPOSITION INFORMATION:

DATE	COURT ACTION	JUDGE	PART
03/28/2023	CASE CONTINUED	TEST,	SAP
06/02/2023	DISM - LEGALLY INSUFFICIENT	CHIN,C	SAP2

I HEREBY CERTIFY THAT THIS IS A TRUE EXCERPT OF THE RECORD ON FILE IN THIS COURT.

**L. Watson - SCC**

**06/06/2023**

COURT OFFICIAL SIGNATURE AND SEAL

DATE

All marijuana convictions under PL 221.05, PL 221.10, PL 221.15, PL 221.20, PL 221.35 or PL 221.40 - including any appearing on this certificate of disposition - are vacated, dismissed, sealed and expunged. It is an unlawful discriminatory practice for any entity to make any inquiry about such an expunged conviction or to use such an expunged conviction adversely against an individual in any form of application or otherwise-unless specifically required or permitted to do so by statute.

Pursuant to section 70.15 of the Penal Law, any misdemeanor sentence with a jail term of "1 year", "12 months", or "365 days" is, by operation of law, deemed to be a sentence of 364 days. Any Certificate of Disposition indicating a jail sentence of "1 year", "12 months", "52 weeks", or "365 days" for a misdemeanor conviction shall be interpreted as a sentence of 364 days.

(CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE  
COURT SEAL OVER THE SIGNATURE OF THE COURT OFFICIAL.)

**INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

*SEE ATTACHED*

**IV. RELIEF**

State briefly what money damages or other relief you want the court to order.

*SEE ATTACHED*

**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

06/24/2024  
Dated

[Signature]  
Plaintiff's Signature

AKANUYENE W  
First Name Middle Initial

ETUK  
Last Name

2404 ATLANTIC AVENUE #04  
Street Address

BROOKLYN  
County, City

NY  
State

11233  
Zip Code

(888) 485-9411 (929) 676-0970  
Telephone Number

awetuk001@gmail.com  
Email Address (if available)

~~I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:~~

~~☒ Yes ☐ No~~

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

10/22/22, 12:22 PM

Vet Treatment History



2336 Linden Boulevard  
Brooklyn NY 11228  
212-788-4000

## Vet Treatment History

Owner Details

Akaniyene Etuk  
1923 McDonald Avenue APT 167  
BROOKLYN NY 11223

818 485 9411  
818 485 9411

Animal Details

Name: Veilee  
Type: Dog  
Mixed: Yes  
Color(1): Unknown (update later)  
Gender: Female  
Spayed / Neutered: Unknown  
Age: 10 Months

This is to confirm that our records show that the animal described above has had the following vaccinations and treatments administered:

Vet Treatment Type	Date Given	Type	Expiration Date	Route Of Admin	Result	Vet	License #
1 Rabies Vaccine	22-Oct-2022	Killed				VET-P 991234	NY-010887
Vet Treatment Type	Due Date						
1 Rabies Vaccine	22-Oct-2023						

Vet Signature:

  
Dr. Michelle Lugones

Date: 10/22/2022 1:19:00 PM



Animal  
Care Centers  
of NYC

## Reunification Form

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212-788-4000

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Gender	Spayed / Neutered	Age	Incoming Date	License fee	
Female	No	3 Years	6-Jul-2023		

### Reunification Details:

Item	Amount

### Products / Services:

Product / Service	Date	Quantity	Price Each
Microchip Implantation		1	\$0.00
Microchip Implantation		1	\$0.00
Bordetella Vaccine		1	\$15.00
DA2PP Vaccine		1	\$15.00
Dewormer Treatment		1	\$12.00
Medical Exam		1	\$30.00
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Restoration/Redemption Fee		1	\$3.00
Total products / services fee included in payment details below:			\$124.00

### Payment Details:

Fee	Amount
Reunification	\$0.00
Dog License	\$0.00
Amount Paid	\$0.00

#### Notes:

Entered By:456 991311 Printed By:456 991311 Printed On:Jul 12 2023 10:10AM

### Reunification Agreement:

REUNIFICATION CONTRACT



Animal  
Care Centers  
of NYC

## Agency Receipt

326 East 110th Street  
New York NY 10029  
212-788-4000

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Receipt #: 285399  
Receipt Date: 5/25/2024

Person Name: Police 52nd Precinct Police 52nd Precinct  
 Person Address: 3016 Webster Avenue  
 Bronx NY 10467  
 Home Phone:  
 Mobile Phone: 718 220 5811  
 Email:  
 Identification Type:  
 ID Number:

### Animal Details

Animal ID	Name	Type	Mixed	Color(1)	Color(2)
1 153814	Veillee	Dog	Yes	Black	Tan
Gender	Spayed / Neutered	Age	Primary Microchip #	Rabies Tag	Date In / Found
Female	No	3 Years 8 Months 3 Weeks (approx)	985113005559199	23-278818	25-May-2024

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Fee	Amount
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Entered By:1582 992296 Printed By:1582 992296 Printed On:May 25 2024 9:47PM Entered By User ID:1582

### Conditions:

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In consideration of Animal Care Centers of New York City ("ACC") accepting the animal described herein ("this animal"), I understand and agree as follows (please initial each section):

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ACC may require that questions or other requests regarding the outcome of this animal be made in writing.

If this animal has bitten a person or animal, I will inform ACC.

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MY ACCOUNT

HANDLER INFO

REGISTERED ANIMALS

**Akaninyene Etuk**  
1923 McDonald Avenue #167, Brooklyn,  
NY, 11223  
Email:  
polyphonicsystems@gmail.com  
Phone: 2125630546

**Animal #1: Vellou**  
Breed: Rottweiler  
Type: Service Dog

**Handler: Akaninyene Etuk**  
1923 McDonald Avenue #167,  
Brooklyn, NY, 11223  
polyphonicsystems@gmail.co  
m | 2125630546

**Registration: T009076684**  
Service: Medical Alert  
Training Status: My Dog is  
Trained Service animal

There's heading letter quiet.  
How to make my dog bark.  
Forget my registration no.

Print

11:04 AM

6/24/2024

CERTIFICATE OF DISPOSITION  
NUMBER: 48917

THE PEOPLE OF THE STATE OF NEW YORK  
VS.

ETUK, AKANINYENE

DEFENDANT

900 E 35TH ST APT D2 D2

ADDRESS

BROOKLYN NY 11210-3448

CITY STATE ZIP

DOCKET NUMBER: 2023SX005516

**NO FEE**

01/08/1997

DATE OF BIRTH

03/09/2023

ISSUE DATE

SUMMONS NUMBER: 4446495564

PL 240.20 02 0V

ARRAIGNMENT CHARGES

CASE DISPOSITION INFORMATION:

DATE COURT ACTION

03/28/2023 CASE CONTINUED

06/02/2023 DISM - LEGALLY INSUFFICIENT

JUDGE PART

TEST, SAP

CHIN,C SAP2

I HEREBY CERTIFY THAT THIS IS A TRUE EXCERPT OF THE RECORD ON FILE IN THIS COURT.

**L. Watson - SCC**

06/06/2023

COURT OFFICIAL SIGNATURE AND SEAL

DATE

All marijuana convictions under PL 221.05, PL 221.10, PL 221.15, PL 221.20, PL 221.35 or PL 221.40 - including any appearing on this certificate of disposition - are vacated, dismissed, sealed and expunged. It is an unlawful discriminatory practice for any entity to make any inquiry about such an expunged conviction or to use such an expunged conviction adversely against an individual in any form of application or otherwise-unless specifically required or permitted to do so by statute.

Pursuant to section 70.15 of the Penal Law, any misdemeanor sentence with a jail term of "1 year", "12 months", or "365 days" is, by operation of law, deemed to be a sentence of 364 days. Any Certificate of Disposition indicating a jail sentence of "1 year", "12 months", "52 weeks", or "365 days" for a misdemeanor conviction shall be interpreted as a sentence of 364 days.

(CAUTION: THIS DOCUMENT IS NOT OFFICIAL UNLESS EMBOSSED WITH THE COURT SEAL OVER THE SIGNATURE OF THE COURT OFFICIAL.)

United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Akaniyene William Etuk**  
2402 Atlantic Avenue  
Brooklyn, New York, 11233  
awetuk001@gmail.com  
1(818) 485-9411 / 1(929) 676-0970

**Pro Se Plaintiff**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**Akaniyene William Etuk,**  
Plaintiff,

v.

**New York City Police Department, et al.,**  
Defendants.

**Case No.:** \_\_\_\_\_

**COMPLAINT**

## **Introduction**

1. This is a civil rights action brought by Plaintiff, Akaniyene William Etuk, against officers of the New York City Police Department ("NYPD") for violations of Plaintiff's constitutional rights, including the right to travel, the right to privacy, protection against unreasonable searches and seizures, and violations of the Americans with Disabilities Act ("ADA").

## **Jurisdiction and Venue**

2. This Court has jurisdiction over this action under 28 U.S.C. § 1331 (federal question jurisdiction) and 42 U.S.C. § 1983 (civil action for deprivation of rights).
3. Venue is proper in the Southern District of New York under 28 U.S.C. § 1391(b) because the events giving rise to this claim occurred in this district.

## **Parties**

4. Plaintiff, Akaniyene William Etuk, is a resident of Brooklyn, New York who was at the time of incident residing in the Bronx, New York .
5. Defendant, New York City Police Department, is a municipal agency located at 1 Police Plaza, New York, NY 10038.
6. Defendant Officer Frias, shield number 30952, is an officer of the NYPD involved in the events described herein.

## **Facts**

7. On August 30, 2023, at approximately 6:34 PM, Officer Frias and several other NYPD officers stopped Plaintiff on a train platform without Plaintiff's permission, contractual agreement, or being a crime victim.
8. Plaintiff was accompanied by a registered service animal providing essential services at the time of the stop. The service animal was registered and vaccinated at the time, and a copy of the service animal registration and vaccination papers are attached as Exhibits B and C, respectively.
9. Officers of the NYPD stopped Plaintiff without a contract, thereby violating Plaintiff's right to travel.
10. Officers of the NYPD, without a contract, forced Plaintiff to identify himself, violating Plaintiff's right to privacy.
11. Officers of the NYPD made legal determinations without possessing a license to practice law.
12. Officers of the NYPD did not show their identification cards to verify themselves as registered policemen.
13. Officers of the NYPD approached Plaintiff with guns, under threat, duress, and coercion, attempting to force Plaintiff to sign an offer of contract (CJTN 70425074/NYSID 16037193M, which was registered and dismissed in court under case #B23637196). A copy of the dismissal certificate is attached as Exhibit A.
14. Officers of the NYPD used excessive force, causing pain and injury, before placing Plaintiff in handcuffs.

15. Officers of the NYPD transported Plaintiff to a different location from his intended point of travel, where Plaintiff's prints were taken without his consent or contractual agreement.
16. Defendants' actions in stopping and arresting Plaintiff and his registered service animal, who was providing essential services at the time, constituted discrimination under the Americans with Disabilities Act (ADA).
17. There is no evidence that these officers signed an oath to "We the People."
18. There is no evidence that these officers are legitimate police or policy enforcers for the original republic.
19. There is no evidence that these officers are not working for a foreign corporation.

### **Claims for Relief**

#### **Count I: Violation of the Right to Travel**

20. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

21. Defendants' actions on August 30, 2023, violated Plaintiff's right to travel freely within the United States.

#### **Count II: Violation of the Right to Privacy**

22. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

23. Defendants' actions in forcing Plaintiff to identify himself without justification violated Plaintiff's right to privacy.

**Count III: Unauthorized Legal Determinations**

24. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

25. Defendants made legal determinations without possessing a license to practice law.

**Count IV: Failure to Identify as Police Officers**

26. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

27. Defendants did not show their identification cards to verify themselves as registered policemen.

**Count V: Excessive Force**

28. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

29. Defendants used excessive force against Plaintiff, causing pain and injury, before placing Plaintiff in handcuffs.

**Count VI: Unlawful Transport and Processing**

30. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

31. Defendants transported Plaintiff to a different location and processed Plaintiff's prints without his consent or contractual agreement.

**Count VII: Violation of ADA**

32. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

33. Defendants violated the Americans with Disabilities Act (ADA) by stopping and arresting Plaintiff and his registered service animal, who was providing essential services at the time.

**Count VIII: Violation of Oath to "We the People"**

34. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

35. Defendants did not sign an oath to "We the People," as required.

**Count IX: Impersonation as Legitimate Police**

36. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

37. Defendants are not legitimate police or policy enforcers for the original republic.

**Count X: Employment by a Foreign Corporation**

38. Plaintiff incorporates by reference the allegations set forth in paragraphs 1-19 as though fully set forth herein.

39. Defendants are working for a foreign corporation.

**Prayer for Relief**

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in his favor and against Defendants, and award Plaintiff:

- A. One million dollars (\$1,000,000.00) for each violation of Plaintiff's constitutional rights, ADA violations, and other legal standards;
- B. One million dollars (\$1,000,000.00) for each violation involving Plaintiff's service animal;
- C. Punitive damages in an amount to be determined at trial;
- D. Declaratory relief stating that Defendants' actions violated Plaintiff's constitutional rights, ADA, and other legal standards;
- E. Injunctive relief preventing Defendants from engaging in similar conduct in the future;
- F. Reasonable attorney's fees and costs of this action;
- G. Such other and further relief as the Court deems just and proper.

### **Judge Demand**

Plaintiff demands a trial by a judge on all issues so triable.

### **Exhibits**

- Exhibit A: Copy of Dismissal Certificate
- Exhibit B: Copy of Service Animal Registration
- Exhibit C: Copy of Service Animal Vaccination Papers

Dated: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Respectfully submitted,

---

Akaniyene William Etuk

Plaintiff, Pro Se

2402 Atlantic Avenue

Brooklyn, New York, 11233

awetuk001@gmail.com

1(818) 485-9411 / 1(929) 676-0970



2336 Linden Boulevard  
Brooklyn NY 11208  
212-788-4000

### Vet Treatment History

#### Owner Details

Akaniyene Etuk  
1923 McDonald Avenue APT 167  
BROOKLYN NY 11223

818 485 9411  
818 485 9411

#### Animal Details

Name: Veilee  
Type: Dog  
Mixed: Yes  
Color(1): Unknown (update later)  
Gender: Female  
Spayed / Neutered: Unknown  
Age: 10 Months

This is to confirm that our records show that the animal described above has had the following vaccinations and treatments administered:

Vet Treatment Type	Date Given	Type	Expiration Date	Route Of Admin	Result	Vet	License #
1 Rabies Vaccine	22-Oct-2022	Killed				VET-P 991234	NY-010887

Vet Treatment Type	Due Date
1 Rabies Vaccine	22-Oct-2023

Vet Signature:

Dr. Michelle Lugo

Date: 10/22/2022 1:19:00 PM



Animal  
Care Centers  
of NYC

## Reunification Form

326 East 110th Street  
New York NY 10029  
212-788-4000

### Agent / Owner's Details

Person ID: 138876  
Receipt #: 249314  
Receipt Date: 7/12/2023

Person Name: Akaninyene Eink

Person Address: 1923 Mc donald Avenue APT 167  
BROOKLYN NY 11223

Home Phone:

Mobile Phone: 818 489 9411

Email: awetuk01@gmail.com

### Animal Details:

Animal ID	Name	Type	Mixed	Color(1)	Color(2)
1 176452	Veillee	Dog	Yes	Black Brown	
Gender	Spayed / Neutered	Age	Incoming Date	License fee	
Female	No	3 Years	6-Jul-2023		

### Reunification Details:

Item	Amount
------	--------

### Products / Services:

Product / Service	Date	Quantity	Price Each
Microchip Implantation		1	\$0.00
Microchip Implantation		1	\$0.00
Bordetella Vaccine		1	\$15.00
DA2PP Vaccine		1	\$15.00
Dewormer Treatment		1	\$12.00
Medical Exam		1	\$30.00
NYC Dog Licence, unaltered [LICU]		1	\$34.00
Rabies Vaccine		1	\$15.00
Restoration/Redemption Fee		1	\$3.00
Total products / services fee included in payment details below:			\$124.00

### Payment Details:

Fee	Amount
Reunification	\$0.00
Dog License	\$0.00
Amount Paid	\$0.00

#### Notes:

Entered By:456 991311 Printed By:456 991311 Printed On:Jul 12 2023 10:10AM

### Reunification Agreement:

REUNIFICATION CONTRACT



Animal  
Care Centers  
of NYC

## Agency Receipt

326 East 110th Street  
New York NY 10029  
212-788-4000

### Person Details

Person ID: 5951  
Receipt #: 285399  
Receipt Date: 5/25/2024

Person Name: Police 52nd Precinct Police 52nd Precinct

Person Address: 3016 Webster Avenue  
Bronx NY 10467

Home Phone:

Mobile Phone: 718 220 5811

Email:

Identification Type:

ID Number:

### Animal Details

Animal ID	Name	Type	Mixed	Color(1)	Color(2)
1 153814	Veillee	Dog	Yes	Black	Tan
Gender	Spayed / Neutered	Age	Primary Microchip #	Rabies Tag	Date In / Found
Female	No	3 Years 8 Months 3 Weeks (approx)	985113005559199	23-278818	25-May-2024

### Payment Details:

Fee	Amount
	\$0.00

### Notes:

Jurisdiction: Bronx

Entered By:1582 992296 Printed By:1582 992296 Printed On:May 25 2024 9:47PM Entered By User ID:1582

### Conditions:

ACC's Surrender Prevention program can help you keep your pet! This program can provide you with information about free or low-cost veterinary care, pet food, behavior training, and more. Would you like to speak with an Admissions Counselor for more information? ☐ YES ☐ NO

### PLEASE CONSIDER CAREFULLY

ANIMALS SURRENDERED TO ACC ARE CAREFULLY EVALUATED BASED ON AVAILABLE MEDICAL AND BEHAVIOR INFORMATION FOR ADOPTION, TRANSFER TO A RESCUE PARTNER, OR EUTHANASIA (HUMANELY PUT TO DEATH) AT THE SOLE DISCRETION OF ACC.

In consideration of Animal Care Centers of New York City ("ACC") accepting the animal described herein ("this animal"), I understand and agree as follows (please initial each section):

ACC does not guarantee that this animal will be adopted by a member of the public or transferred to a rescue partner. I understand that the length of time the animal may be held and the outcome, including adoption or humane euthanasia, is solely ACC's decision.

ACC may require that questions or other requests regarding the outcome of this animal be made in writing.

If this animal has bitten a person or animal, I will inform ACC.



## Print

**Akaninyene Etuk**  
1923 McDonald avenue #167, Brooklyn,  
NY, 11223  
Email:  
polyphonicsystems@gmail.com  
Phone: 2135630546

Animal #1: Vellec  
Breed: Rottweiler  
Type: Service Dog

Handler: Akaminyene Etuk  
1933 McDonald avenue #167  
Brooklyn, NY, 11223  
polyphenic systems@gmail.co  
m | 2135130546

Registration: 1009076684  
Service: Medical Alert  
Training Status: My Dog is  
a Trained Service animal

Have houring letter quest.  
How to make my dog serv.  
Forget my registration no.

CERTIFICATE OF DISPOSITION  
NUMBER: 48917

THE PEOPLE OF THE STATE OF NEW YORK  
VS.

ETUK, AKANINYENE

DEFENDANT

900 E 35TH ST APT D2 D2

ADDRESS

BROOKLYN NY 11210-3448

CITY STATE ZIP

DOCKET NUMBER: 2023SX005516

**NO FEE**

01/08/1997

DATE OF BIRTH

03/09/2023

ISSUE DATE

SUMMONS NUMBER: 4446495564

PL 240.20 02 0V

ARRAIGNMENT CHARGES

CASE DISPOSITION INFORMATION:

DATE COURT ACTION

03/28/2023 CASE CONTINUED

JUDGE PART

TEST, SAP

06/02/2023 DISM - LEGALLY INSUFFICIENT

CHIN,C SAP2

I HEREBY CERTIFY THAT THIS IS A TRUE EXCERPT OF THE RECORD ON FILE IN THIS COURT.

**L. Watson - SCC**

06/06/2023

COURT OFFICIAL SIGNATURE AND SEAL

DATE

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